

1 Roy A. Combs, SBN 123507  
2 rcombs@fagenfriedman.com  
3 Joshua A. Stevens, SBN 228239  
4 jstevens@fagenfriedman.com  
5 FAGEN FRIEDMAN & FULFROST, LLP  
6 70 Washington Street, Suite 205  
7 Oakland, California 94607  
8 Phone: 510-550-8200  
9 Fax: 510-550-8211

10 Attorneys for Defendants PITTSBURG  
11 UNIFIED SCHOOL DISTRICT, BARBARA  
12 WILSON AND PERCY MCGEE

13

14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

16 TIM GALLI,

17 Plaintiff,

18 vs.

19 PITTSBURG UNIFIED SCHOOL  
20 DISTRICT, BARBARA WILSON AND  
21 PERCY MCGEE,

22 Defendant.

23 CASE NO. 3:09-cv-03775-JSW

24 **JOINT STIPULATION AND [PROPOSED]  
25 ORDER CONTINUING DEPOSITION  
26 AND DISPOSITIVE MOTION  
27 DEADLINES**

28 Trial Date: July 25, 2011

Fagen Friedman & Fulfrost, LLP

70 Washington Street, Suite 205  
Oakland, California 94607  
Main: 510-550-8200 • Fax: 510-550-8211

28 **SUBJECT TO THE APPROVAL OF THIS COURT, THE PARTIES HEREBY**

29 **STIPULATE TO THE FOLLOWING:**

30 WHEREAS, the parties reached a tentative settlement agreement, pending approval of the  
31 Pittsburgh Unified School District's ("District") Board of Trustees ("Board"), at the settlement  
32 conference before United States Magistrate Judge Bernard Zimmerman on Thursday, February 10,  
33 2011 ; and

34 WHEREAS, the District's Board will consider the settlement agreement at its regularly  
35 scheduled meeting on March 9, 2011; and

36 WHEREAS, the parties do not wish to incur further attorneys fees and costs associated  
37 with this matter, including but not limited to completing current discovery and drafting dispositive

1 motions, prior to the Board's consideration of the settlement agreement on March 9, 2011.

2 NOW THEREFORE, THE PARTIES HEREBY STIPULATE to continue the deadline to  
3 complete all currently noticed depositions to March 16, 2011; and

4 THE PARTIES FURTHER STIPULATE to continue the deadline to file dispositive  
5 motions to April 1, 2011; and

6 THE PARTIES FURTHER STIPULATE to continue the hearing on all dispositive  
7 May 13, 2011  
motions to ~~May 6, 2011~~; and

8 THE PARTIES FURTHER STIPULATE that all other scheduled dates shall remain the  
9 same.

10 **SO STIPULATED.**

11 DATED: February 15, 2011 Respectfully submitted,

12 FAGEN FRIEDMAN & FULFROST, LLP

14 By: /s/ Roy A. Combs

15 Roy A. Combs

16 Attorneys for Defendants PITTSBURG UNIFIED  
SCHOOL DISTRICT, BARBARA WILSON  
AND PERCY MCGEE

18 DATED: February 15, 2011 Respectfully submitted,

19 THE VENARDI LAW FIRM

21 By: /s/ Mark L. Venardi

22 Mark L. Venardi

23 Attorneys for Plaintiff TIM GALLI

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~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED, pursuant to the above Stipulation of the parties, that the deadline to complete all depositions, both expert depositions and non-expert depositions, be continued to March 16, 2011.

IT IS FURTHER ORDERED, pursuant to the above Stipulation of the parties, that the deadline to file dispositive motions be continued to April 1, 2011; and

IT IS FURTHER ORDERED, pursuant to the above Stipulation of the parties, that the hearing on all dispositive motions be continued to ~~May 6, 2011~~ May 13, 2011 at 9:00 a.m.

DATED: February 15, 2011

Hon. Jeffrey S. White  
UNITED STATES DISTRICT JUDGE

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Oakland, California 94607  
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